Preconstruction Analysis
Boatright Railroad Products
Clanton, Chilton County, Alabama
403-0016-X001/X002

On August 3, 2009, Boatright Railroad Products submitted an application to the ADEM-Air Division for Air Permits which would authorize the construction and operation of a creosote wood treating facility to be located at 100 McKinney Drive in Clanton. Additional information was received on August 20, 2009. The facility's product would be creosote or copper naphthenate-treated hardwood bridge timbers, cross ties, and switch ties. The site does not have any existing structures and would be considered a Greenfield site. Based on the information submitted, the facility would be a minor source under Title V and PSD regulations. Air Permit No. X001 would be issued for the wood-fired boiler and Air Permit No. X002 would be issued for the creosote and copper naphthenate wood treating operation.

Proposed Operations

Proposed air emission sources would include a 14.75 MMBtu/hr wood-fired boiler with multiclone, a creosote wood treating process with wet scrubber (absorber), copper naphthenate wood treating process, and a biological waste water treatment system and evaporator. The facility would also utilize an uncontrolled trim saw to cut incoming timbers to the appropriate length. There would be no pneumatic wood waste transfer systems. Negligible emission sources included in the application were a 12,000 gallon above ground diesel fuel tank, mobile diesel internal combustion engines, and a borate treatment system.

Creosote Operation

In the proposed creosote treating plant, incoming bridge timbers, cross ties, and switch ties would be separated by length, end-sized, and trimmed, stamped, and air-dried prior to being treated with creosote, copper naphthenate, or a borate solution. The creosote treating process would consist of one 140' x 8' treating cylinder, one work tank, a 25,000 gallon creosote storage tank, a wet absorber, and a biological waste water treatment system. The creosote treating system would have a potential production (continuous throughput at 8760 hr/yr) of approximately 3.786 $MMft^3$ annually, though the actual production should be far less. Vapors from the creosote treating cylinder (via hoods positioned above each end) and the two work tanks would be vented to a wet absorber, which would reduce captured VOC prior to exhausting to the atmosphere. The liquid effluent would be processed through the waste water treatment system, which has a capacity of 4,500 gallons per day. Treated water would be evaporated in two heated 1,000 gallon evaporation tanks.

Copper Naphthenate Operation

The copper naphthenate treating process would consist of one 140' x 8' treating cylinder, one 25,000 gallon copper naphthenate storage tank, a 25,000 gallon diesel tank, and a mix tank (to combine copper naphthenate and diesel). The copper naphthenate treating system would have a

potential production (continuous throughput at 8760 hr/yr) of approximately 7.573 $MMft^3$ annually, though the actual production should be far less.

Borate Operation
The borate treatment system would consist of one treating cylinder, a 1,000 gallon work tank, a 10,000 gallon concentrate storage tank, and a dip tank. The borate treatment solution is a water-borne salt solution, and this process would not be an air emission source.

Process Heat Generation
Steam used in the treating process and waste water evaporator would be provided by a new conventional (non-gasification) 14.75 MMBtu/hr wood-fired boiler equipped with a multiclone. Boiler fuel would consist of purchased green bark and sawdust.

Emissions

Emission calculations and a facility-wide emission summary are included as Appendix A. Emissions from the proposed boiler would be the products of combustion, which include particulate matter (PM), carbon monoxide (CO), nitrogen oxides (NO_x), and negligible amounts of sulfur dioxide (SO_2) and volatile organic compounds (VOC). Emissions from the creosote treating process would be VOC and various hazardous air pollutants (HAP). The emission calculations in the applications, based on AP-42 and engineering estimates, indicate facility-wide potential total HAP emissions of 11.38 TPY, with the potential emissions of the highest-emitted HAP, Polycyclic Organic Matter (POM), calculated at 7.5 TPY. The calculations assumed control efficiencies of 80% for the absorber (WP-1) and biological waste water treatment systems (F-WW). Potential VOC emissions from the copper naphthenate process, based on AP-42 and engineering estimates, would be 17.5 TPY as VOC. Treated wood storage emissions would be uncontrolled.

Federal Regulations

Title V

After construction, the facility-wide potential emissions for all criteria pollutants would less than the 100 TPY major source threshold, and the facility-wide potential emissions for all hazardous air pollutants (HAP) would less than the 10/25 TPY major source thresholds.

PSD

The facility operations would not be one of the 28 listed major source categories; therefore, the major source threshold of concern would be 250 TPY. After construction, the facility-wide potential emissions for all criteria pollutants would less than the 250 TPY major source threshold.

MACT

The facility operation does not use chromium, arsenic, dioxins, or methylene chloride for preserving lumber. Therefore, 40 CFR Part 63, Subpart QQQQQQ (Wood Preserving NESHAP) is not applicable.

NSPS

Due to the proposed boiler's size and construction date, it would be subject to the federal New Source Performance Standards for boilers, 40 CFR 60, Subpart Dc. The only requirements under the NSPS applicable to the proposed boiler would be the fuel usage recordkeeping requirements.

The proposed 25,000 gallon creosote and diesel storage tanks would not be subject to the federal New Source Performance Standards for tanks, 40 CFR 60, Subpart Kb, because the maximum true vapor pressures of the materials stored are < 2.2 psia.

State Regulations

Particulate Matter

The proposed wood-fired boiler would be subject to the State particulate emission standard of 0.20 gr/dscf @ 50% excess air [ADEM Admin. Code r. 335-3-4-.08(2)(d)] and the State visible emission standards [ADEM Admin. Code r. 335-3-4-.01].

Sulfur Dioxide

The proposed wood-fired boiler would be subject to the State sulfur dioxide emission standard of 4.0 lb/MMBtu of heat input [ADEM Admin. Code r. 335-3-5-.01(1)(b)]. However, as SO_2 emissions are negligible from wood waste combustion, the potential emissions using AP-42 emission factors (1.6 TPY) will be used in this analysis for applicability purposes under Title V and PSD regulations.

VOC

The tanks storing creosote and diesel fuel would not be subject to any VOC standards under ADEM Admin. Code r. 335-3-6-.03 since the maximum vapor pressure of these materials is less than 1.5 psia.

Emission Testing

Although the emission calculations indicate that the boiler would be capable of complying with the SIP particulate emission limit, I recommend that initial particulate and visible emission compliance tests be required as, historically, the Department has found that multiclones may not be effective in controlling particulate emissions from some boilers.

Air Quality Impact

This facility would be located in Chilton County, which is an attainment area for all criteria pollutants. The facility would not be located within 100 km of any PSD Class I Area. Therefore, emissions from the proposed facility are not expected to have a significant impact on any such area.

Public Comment Period

Since the proposed facility would be considered construction at a Greenfield site, a 15-day public comment period will be required prior to permit issuance.

Recommendations

Pending the resolution of any comments received during the 15-day public comment period, I recommend that Air Permit Nos. X001 and X002 be issued for the proposed 14.75 MMBtu/hr wood-fired boiler and wood treating operations, respectively. Since the potential emissions from the timber end-cutting operation would be negligible and of a large particle size, I recommend that a permit not be required for this process at this time.

Corey D. Ohme
Chemical Branch
Air Division

08/26/2009
Date

CDO/cdo

Appendix A
Calculations/Emission Summary
Boatright Railroad Products
403-0016; X001/X002

X001 - 14.75 MMBtu/hr Wood-Fired Boiler with Multiclone

Control Equipment:	Multiclone
Hours of Operation:	8760 hr/yr (ADEM Form 104)
Air Flow:	5860 dscf/min (ADEM Form 110)
Fuel Heat Content:	4500 Btu/lb (bark/green sawdust)

Particulate Emissions (as TSP)

Allowable: 0.20 gr/dscf, adjusted to 50% excess air; Admin. Code R. 335-3-4.08(2)(d)

$$\frac{5860 \text{ dscf}}{\text{min}} \left| \frac{60 \text{ min}}{\text{hr}} \right| \frac{0.2 \text{ gr}}{\text{dscf}} \left| \frac{\text{lb}}{7000 \text{ gr}} \right. = 10.05 \text{ lb/hr or } 44 \text{ TPY @ } 8760 \text{ hr/yr}$$

Note: BRP's consultant calculated the allowable rate at 8.04 lb/hr (35.2 TPY). The consultant's calculation estimated the correction to 50% excess air.

Uncontrolled: Based on AP-42 factor (3/02) of 0.56 lb/MMBtu heat input

$$\frac{0.56 \text{ lb}}{\text{MMBtu}} \left| \frac{14.75 \text{ MMBtu}}{\text{hr}} \right. = 8.26 \text{ lb/hr or } 36.2 \text{ TPY @ } 8760 \text{ hr/yr}$$

Controlled/Estimated Actual Emissions: Based on AP-42 factor (3/02) of 0.35 lb/MMBtu heat input

$$\frac{0.35 \text{ lb}}{\text{MMBtu}} \left| \frac{14.75 \text{ MMBtu}}{\text{hr}} \right. = 5.16 \text{ lb/hr or } 22.6 \text{ TPY @ } 8760 \text{ hr/yr}$$

Other Potential/Estimated Actual Emissions

PM_{10}: *Controlled/Actual*; Based on AP-42 factor (3/02) of 0.32 lb/MMBtu heat input

$$\frac{0.32 \text{ lb}}{\text{MMBtu}} \left| \frac{14.75 \text{ MMBtu}}{\text{hr}} \right. = 4.72 \text{ lb/hr or } 20.7 \text{ TPY @ } 8760 \text{ hr/yr}$$

$PM_{2.5}$: *Controlled/Actual*; Based on AP-42 factor (3/02) of 0.19 lb/MMBtu heat input

$$\frac{0.19 \text{ lb}}{\text{MMBtu}} \left| \frac{14.75 \text{ MMBtu}}{\text{hr}} \right. = 2.8 \text{ lb/hr or } 12.3 \text{ TPY @ } 8760 \text{ hr/yr}$$

CO: Based on AP-42 factor (3/02) of 0.6 lb/MMBtu heat input

$$\frac{0.6 \text{ lb}}{\text{MMBtu}} \left| \frac{14.75 \text{ MMBtu}}{\text{hr}} \right. = 8.85 \text{ lb/hr or } 38.8 \text{ TPY @ } 8760 \text{ hr/yr}$$

SO_2: Based on AP-42 factor (3/02) of 0.025 lb/MMBtu heat input

$$\frac{0.025 \text{ lb}}{\text{MMBtu}} \left| \frac{14.75 \text{ MMBtu}}{\text{hr}} \right. = 0.37 \text{ lb/hr or } 1.6 \text{ TPY @ } 8760 \text{ hr/yr}$$

NOx: Based on AP-42 factor (3/02) of 0.6 lb/MMBtu heat input

$$\frac{0.22 \text{ lb}}{\text{MMBtu}} \left| \frac{14.75 \text{ MMBtu}}{\text{hr}} \right. = 3.25 \text{ lb/hr or } 14.2 \text{ TPY @ } 8760 \text{ hr/yr}$$

VOC: Based on AP-42 factor (3/02) of 0.6 lb/MMBtu heat input

$$\frac{0.017 \text{ lb}}{\text{MMBtu}} \left| \frac{14.75 \text{ MMBtu}}{\text{hr}} \right. = 0.25 \text{ lb/hr or } 1.1 \text{ TPY @ } 8760 \text{ hr/yr}$$

X002 – Wood Preserving Operations

Lumber Type: Hardwood Timbers
Process Capacity: 3.786 $MMft^3/yr$
Operating Hours: 8760 hr/yr (24 x 7 x 52)
Control Device: Wet Absorber; Biological Waste Water Treatment System

1. Creosote Wood Treatment

Particulate Emissions: (N/A; not a significant source of particulate emissions)

The VOC and HAP emission factors for Creosote assumed a correction for vapor pressure and 80% control efficiency.

VOC: Based on AP-42 factor (3/02) of Creosote treatment[1] and storage[2].

2.48 lb/hr[1] + 0.50 lbs/hr[2] = 2.98 lb/hr or 13.05 TPY @ 8760 hr/yr

Total HAP: Based on AP-42 factor (3/02) of Creosote treatment[1] and storage[2].

2.58 lb/hr[1] + 0.014 lb/hr[2] = 2.60 lb/hr or 11.38 TPY @ 8760 hr/yr

POMs: Based on AP-42 factor (3/02) of Creosote treatment[1] and storage[2].

0.004 lb/hr[1] + 1.70 lb/hr[2] = 1.704 lb/hr or 7.50 TPY @ 8760 hr/yr

2. Copper Naphthenate

Particulate Emissions: (N/A; not a significant source of particulate emissions)

VOC: Based on EPA document 560/4-88-002 of Copper Naphthenate treatment[1] and storage[2].

3.85 lb/hr[1] + 0.14 lbs/hr[2] = 3.98 lb/hr or 17.47 TPY @ 8760 hr/yr

Appendix B
Draft Permits
Boatright Railroad Products
403-0016; X001/X002

ADEM
Alabama Department of Environmental Management

AIR PERMIT

PERMITTEE: BOATRIGHT COMPANIES

FACILITY NAME: BOATRIGHT RAILROAD PRODUCTS

LOCATION: CLANTON, CHILTON COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
403-0016-X001	14.75 MMBtu/hr Wood-Fired Boiler with Multiclone

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: **Draft**

Alabama Department of Environmental Management

BOATRIGHT RAILROAD PRODUCTS
CLANTON, ALABAMA
(PERMIT NO. 403-0016-X001)
PROVISOS

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.

3. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

4. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

5. Each point of emission will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.

6. In case of shutdown of air pollution control equipment for scheduled maintenance, the intent to shut down shall be reported to the Air Division at least 24 hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. The Air Division shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

7. In the event there is a breakdown of equipment or upset of the process in such a manner as to cause, or is expected to cause, increased emission of air contaminants which are above the applicable standard, the person responsible for such equipment shall notify the Air Division within 24 hours or the next working day and provide a statement giving all pertinent facts, including the duration of the breakdown. The Air Division shall be notified when the breakdown has been corrected.

8. This process, including all air pollution control devices and capture systems for which this permit is issued shall, be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.

9. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.

10. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.

11. Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.

12. All the original data charts, performance evaluations, calibration checks, adjustment and maintenance records and other information regarding monitoring system(s) will be maintained in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports and records.

13. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

14. Nothing in this permit or conditions thereto shall negate any authority granted to the Department pursuant to the Alabama Environmental Management Act or regulations issued thereunder.

15. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.

16. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

17. Prior to a date to be specified by the Chief of the Air Division in the Temporary Authorization to Operate (TAO), emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, for the following pollutants. Written tests results are to be reported to the Air Division within 30 days of completion of testing, or as stated otherwise in this Air Permit or a subject regulation, or unless an extension of time is requested by the facility and approved by the Department.

Particulate	(X)	Carbon Monoxide	( )
Sulfur Dioxide	( )	Nitrogen Oxides	( )
Volatile Organic Compounds	( )	Visible Emissions	(X)

18. Unless stated otherwise in this Air Permit or in a subject regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

    To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

    (1) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.

    (2) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

    (3) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

    (4) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

    A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

    Unless stated otherwise in this Air Permit or in a subject regulation, all test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless the Air Division specifically approves an extension of time.

19. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.

20. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

    Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

(a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;

(b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;

(c) by paving;

(d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

21. This boiler is limited to the use of only untreated wood waste as fuel. Approval must be received from the Air Division prior to burning any other type fuel.

22. This boiler is subject to the applicable requirements of the Standards of Performance for New Stationary Sources; Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, which include but may not be limited to the following:

    (a) Records of fuel usage shall be recorded and maintained in a permanent form suitable for inspection. Records may be recorded on a daily or monthly basis (§60.48c(g)); and

    (b) All records required under Subpart Dc shall be maintained for a period of two years from the date of generation and be made available upon request (§60.48c(i)).

23. This boiler shall not emit particulate (as TSP) in excess of 0.20 gr/dscf, adjusted to fifty percent (50 %) excess air.

24. Any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9.

25. The following "emission monitoring" requirements apply to this process:

    a) While the boiler is operating, someone familiar with the process shall observe the visible emissions from the boiler stack a minimum of once daily during daylight hours for greater than normal visible emissions as determined by previous observations.

b) The multiclone shall be inspected for proper operation and cleaned, if needed, at least annually and whenever observed visible emissions are greater than normal.

c) Whenever observed visible emissions are greater than normal, corrective action to minimize emissions shall be initiated as soon as practicable but no longer than 24 hours from the time of the observation, followed by an additional observation to confirm that emissions are reduced to normal.

d) Records, including the dates and times, of all daily visual stack observation results, inspections, corrective action taken, and emissions-related maintenance performed shall be maintained in a logbook and made available for inspection for at least two (2) years from the date of generation of each record. For any day that a visual observation is not conducted due to the boiler not being operated the entire workday, the records should indicate the non-operational status for that day.

26. Precautions shall be taken by the facility and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's Rules and Regulations applicable to open burning to be violated.

DRAFT
Date

ADEM
Alabama Department of Environmental Management

AIR PERMIT

PERMITTEE: BOATRIGHT COMPANIES

FACILITY NAME: BOATRIGHT RAILROAD PRODUCTS

LOCATION: CLANTON, CHILTON COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
403-0016-X002	Wood Preserving Operations, which include: 1. Creosote Wood Preserving Process with Absorber and, Biological Wastewater Treatment System; and 2. Copper Naphthenate Wood Preserving Process

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: **Draft**

Alabama Department of Environmental Management

BOATRIGHT RAILROAD PRODUCTS
CLANTON, ALABAMA
(PERMIT NO. 403-0016-X002)
PROVISOS

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.

3. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

4. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

5. Each point of emission will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.

6. In case of shutdown of air pollution control equipment for scheduled maintenance, the intent to shut down shall be reported to the Air Division at least 24 hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. The Air Division shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

7. In the event there is a breakdown of equipment or upset of the process in such a manner as to cause, or is expected to cause, increased emission of air contaminants which are above the applicable standard, the person responsible for such equipment shall notify the Air Division within 24 hours or the next working day and provide a statement giving all pertinent facts, including the duration of the breakdown. The Air Division shall be notified when the breakdown has been corrected.

8. This process, including all air pollution control devices and capture systems for which this permit is issued shall, be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.

9. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.

10. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.

11. Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.

12. All the original data charts, performance evaluations, calibration checks, adjustment and maintenance records and other information regarding monitoring system(s) will be maintained in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports and records.

13. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

14. Nothing in this permit or conditions thereto shall negate any authority granted to the Department pursuant to the Alabama Environmental Management Act or regulations issued thereunder.

15. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.

16. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

17. Unless stated otherwise in this Air Permit or in a subject regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

    To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

    (1) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.

(2) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

(3) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

(4) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

Unless stated otherwise in this Air Permit or in a subject regulation, all test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless the Air Division specifically approves an extension of time.

18. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.

19. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:

(a) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;

(b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;

(c) by paving;

(d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

20. Precautions shall be taken by the facility and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's Rules and Regulations applicable to open burning to be violated.

DRAFT
Date